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March 5, 2025

BY ECF

Honorable Naomi Reice Buchwald  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: Stein et al. v. Skatteforvaltningen, No. 23-cv-02508 (NRB)

Dear Judge Buchwald:

We write on behalf of defendant/counterclaim plaintiff Skatteforvaltningen (“SKAT”), in advance of the April 29, 2025 trial in this action, to raise a scheduling issue with respect to the testimony by SKAT’s Danish criminal law expert Per Justesen, and to request that Mr. Justesen be permitted to testify remotely.

Mr. Justesen is a practicing attorney in Denmark and has two different court proceedings in Denmark he is required to attend during the week of April 29, 2025: one in the District Court on April 29, 2025, and the other in the Danish High Court the morning of April 30. These proceedings will prevent Mr. Justesen from traveling to the United States to testify live during that week. Mr. Justesen can be available to testify remotely from Denmark by mid-morning (Eastern Time) on April 30, and at any time on May 1.

Alternatively, should the Court prefer that Mr. Justesen testify in person, we will have to identify another date for his testimony that is convenient to the Court and the parties.

Respectfully submitted,

/s/ Marc A. Weinstein  
Marc A. Weinstein

cc: all counsel of record, via ECF